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Irving H. Picard, Esq., as Trustee for the substantively consolidated SIPA liquidation of Bernard L. Madoff Investment Securities LLC and estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

LEWIS W. BERNARD 1995 CHARITABLE REMAINDER TRUST; LEWIS W. BERNARD in his capacity as Grantor and Trustee and individually; and ROBERT B. FEDUNIAK in his capacity as Special Trustee, Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05063 (SMB)

Defendants.
Defendants.

SECOND AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. The Initial Disclosures shall be due: April 14, 2014.
- 2. Fact Discovery shall be completed by: January 16, 2015.
- 3. The Disclosure of Case-in-Chief Experts shall be due: March 27, 2015.
- 4. The Disclosure of Rebuttal Experts shall be due: April 16, 2015.
- 5. The Deadline for Completion of Expert Discovery shall be: July 15, 2015.
- 6. The Deadline for Service of a Notice of Mediation Referral shall be: On or before September 11, 2015.
- 7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before September 25, 2015.
- 8. The Deadline for Conclusion of Mediation shall be: On or before January 25, 2015.

Dated: New York, New York December 15, 2014

BAKER & HOSTETLER LLP

By: /s/ Nicholas J. Cremona_

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